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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**CAREN EHRET, individually and on
behalf of a class of similarly situated
persons,**

Plaintiff,

v.

**UBER TECHNOLOGIES, INC., a
Delaware Corporation,**

Defendant.

Case No. 3:14-cv-113-EMC

**PLAINTIFF'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

**Judge: Hon. Edward M. Chen
Courtroom: 5**

1 Plaintiff applies for an administrative order under Civil Local Rules 7-11 and 79-5(e) to
2 file certain documents under seal. In support of this motion, Plaintiff states as follows:

3 The parties stipulated to the entry of a protective order in this case, which the Court
4 entered on June 2, 2014. *See* Doc. 43. Under the terms of the protective order, a party may
5 designate documents or testimony as “CONFIDENTIAL” or “CONFIDENTIAL –
6 ATTORNEYS’ EYES ONLY.” *Id.*

7 Defendant Uber Technologies, Inc. (“Uber”) designated several discovery responses and
8 documents as “CONFIDENTIAL” or “CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” As
9 set forth in the attached declaration of Jacie C. Zolna, Plaintiff intends to attach some of these
10 discovery responses and documents to her Memorandum of Points and Authorities in Support of
11 Her Motion for Class Certification, and also intends to quote from them in her brief.
12 Accordingly, pursuant to Civil Local Rule 79-5(e), Plaintiff seeks to file the following
13 documents under seal:

- 14 1) An un-redacted version of Plaintiff’s memorandum of law in support of her motion for
15 class certification;
- 16 2) Uber driver training materials, attached as Ex. C to Plaintiff’s Memorandum of Points
17 and Authorities in Support of Her Motion for Class Certification;
- 18 3) June 6, 2012 email exchange, attached as Ex. D to Plaintiff’s Memorandum of Points and
19 Authorities in Support of Her Motion for Class Certification;
- 20 4) Spreadsheet of payments to Uber drivers, attached as Ex. E to Plaintiff’s Memorandum of
21 Points and Authorities in Support of Her Motion for Class Certification;
- 22 5) PowerPoint presentation on Uber taxi pricing, attached as Ex. F to Plaintiff’s
23 Memorandum of Points and Authorities in Support of Her Motion for Class Certification;
- 24 6) March 22, 2013 email exchange, attached as Ex. G to Plaintiff’s Memorandum of Points
25 and Authorities in Support of Her Motion for Class Certification;
- 26 7) March 25, 2013 email exchange, attached as Ex. H to Plaintiff’s Memorandum of Points
27 and Authorities in Support of Her Motion for Class Certification;
- 28 8) Uber’s Second Amended Response to Interrogatory No. 6, attached as Ex. J to Plaintiff’s
Memorandum of Points and Authorities in Support of Her Motion for Class Certification;

1 9) September 13, 2012 email exchange, attached as Ex. O to Plaintiff's Memorandum of
2 Points and Authorities in Support of Her Motion for Class Certification;

3 10) September 17, 2012 email, attached as Ex. P to Plaintiff's Memorandum of Points and
4 Authorities in Support of Her Motion for Class Certification;

5 11) July 2, 2012 email exchange, attached as Ex. Q to Plaintiff's Memorandum of Points and
6 Authorities in Support of Her Motion for Class Certification;

7 12) June 6-14, 2012 email exchange, attached as Ex. R to Plaintiff's Memorandum of Points
8 and Authorities in Support of Her Motion for Class Certification; and

9 13) October 18, 2012 email exchange, attached as Ex. S to Plaintiff's Memorandum of Points
10 and Authorities in Support of Her Motion for Class Certification.

11 **WHEREFORE**, Plaintiff respectfully requests the Court to enter an order granting her
12 leave to file the above-referenced documents under seal.

13 Dated: July 16, 2015

14 Respectfully submitted,

15 MYRON M. CHERRY & ASSOCIATES LLC
16 MYRON M. CHERRY (50278)

17 By: /s/ Jacie C. Zolna
18 Jacie C. Zolna
19 Attorney for Plaintiff

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing **Plaintiff's Administrative Motion to File Under Seal** upon:

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via the electronic filing system on this 16th day of July, 2015.

/s/ Jacie C. Zolna